

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-
Form Complaint and:

Robert Massey, et al. v. National Football
League, et al. (Plaintiff Rodrigo Barnes
ONLY)

Court File No. 2:12-cv-06069-AB

**MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFF RODRIGO BARNES**

J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Rodrigo Barnes only in this action, and state as follows:

1. Plaintiff's counsel filed the action *Robert Massey, et al. v. National Football League, et al.*, No. 2:12-cv-06069-AB, in the Eastern District of Pennsylvania on September 27, 2012, for the benefit of several retired National Football League players, including Rodrigo Barnes.

2. Plaintiff's counsel filed a short form complaint for Rodrigo Barnes on October 29, 2012.

3. Despite the efforts of the undersigned on Plaintiff's behalf, the NFL Concussion Settlement Claims Administrator informed Zimmerman Reed LLP that Plaintiff advised it that he has terminated Zimmerman Reed and is no longer represented by counsel in this case.

4. Specifically, on May 11, 2022, the Claims Administrator issued an NFL Representation Notification ("Notice") to Zimmerman Reed LLP, stating that Plaintiff informed the Claims Administrator that he is not represented and will proceed *pro se*.

5. The Notice provides "seven days to communicate with the Settlement Class Member and come to a resolution" before the Claims Administrator would "change the Settlement Class Member's representation to *pro se* in [its] database." After repeated attempts to reach Plaintiff, Zimmerman Reed LLP has not discussed further representation with Plaintiff. More than seven days have passed from the Notice date.

6. Under the circumstances, it is apparent that Rodrigo Barnes desires to proceed *pro se*, and that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiff's counsel respectfully requests this Court for leave to withdraw as counsel for Rodrigo Barnes only in Court File No. 2:12-cv-06069-AB.

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Dated: June 10, 2022

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

J. Gordon Rudd, Jr. (#222082)

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